# UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA	:	Hon. Cathy L. Waldor
v.	:	Mag. No. 14-7157
TREMONE BURNETT		
	•	CRIMINAL COMPLAINT

I, James Scartozzi, being duly sworn, state that the following is true and correct to the best of my knowledge and belief.

## SEE ATTACHMENT A

I further state that I am a Special Agent with the Federal Bureau of Investigation, and that this complaint is based on the following facts:

# SEE ATTACHMENT B

continued on the attached page and made a part hereof.

James Scartøzzi, Special Agent Federal Bureau of Investigation

Sworn to before me and subscribed in my presence,

August 20, 2014, at Newark, New Jersey

Hon. Cathy L. Waldor U.S. Magistrate Judge

Signature of Judicial Officer

# ATTACHMENT A

### Count One

On or about May 9, 2014, in Morris County, in the District of New Jersey and elsewhere, defendant

TREMONE BURNETT a/k/a "Tyrone Bennett," a/k/a "Charles Burnett," a/k/a "Jerome Burnett," a/k/a "Leveli Mone," a/k/a "Hassan Thomas," a/k/a "Jermaine Thomas," a/k/a "Termone Thomas," a/k/a "Terak Williams"

did knowingly and willfully obstruct, delay, and affect, and attempt to obstruct, delay, and affect, commerce and the movement of articles and commodities in commerce by robbery and commit and threaten physical violence to Victim 1, an employee of Hotel 1, in furtherance of a plan and purpose to commit robbery.

In violation of Title 18, United States Code, Section 1951(a) and Section 2.

## Count Two

On or about May 31, 2014, in Hudson County, in the District of New Jersey and elsewhere, defendant

TREMONE BURNETT a/k/a "Tyrone Bennett," a/k/a "Charles Burnett," a/k/a "Jerome Burnett," a/k/a "Leveli Mone," a/k/a "Hassan Thomas," a/k/a "Jermaine Thomas," a/k/a "Termone Thomas," a/k/a "Terak Williams"

did knowingly and willfully obstruct, delay, and affect, and attempt to obstruct, delay, and affect, commerce and the movement of articles and commodities in commerce by robbery and commit and threaten physical violence to Victim 2, an employee of Hotel 2, in furtherance of a plan and purpose to commit robbery.

In violation of Title 18, United States Code, Section 1951(a) and Section 2.

#### Count Three

On or about June 8, 2014, in Hunterdon County, in the District of New Jersey and elsewhere, defendant

TREMONE BURNETT a/k/a "Tyrone Bennett," a/k/a "Charles Burnett," a/k/a "Jerome Burnett," a/k/a "Leveli Mone," a/k/a "Hassan Thomas," a/k/a "Jermaine Thomas," a/k/a "Termone Thomas," a/k/a "Terak Williams"

did knowingly and willfully obstruct, delay, and affect, and attempt to obstruct, delay, and affect, commerce and the movement of articles and commodities in commerce by robbery and commit and threaten physical violence to Victim 3, an employee of Hotel 3, in furtherance of a plan and purpose to commit robbery.

In violation of Title 18, United States Code, Section 1951(a) and Section 2.

### **Count Four**

On or about June 15, 2014, in Middlesex County, in the District of New Jersey and elsewhere, defendant

TREMONE BURNETT a/k/a "Tyrone Bennett," a/k/a "Charles Burnett," a/k/a "Jerome Burnett," a/k/a "Leveli Mone," a/k/a "Hassan Thomas," a/k/a "Jermaine Thomas," a/k/a "Termone Thomas," a/k/a "Terak Williams"

did knowingly and willfully obstruct, delay, and affect, and attempt to obstruct, delay, and affect, commerce and the movement of articles and commodities in commerce by robbery and commit and threaten physical violence to Victim 4, an employee of Hotel 4, in furtherance of a plan and purpose to commit robbery.

In violation of Title 18, United States Code, Section 1951(a) and Section 2.

### Count Five

On or about June 15, 2014, in Essex County, in the District of New Jersey and elsewhere, defendant

TREMONE BURNETT a/k/a "Tyrone Bennett," a/k/a "Charles Burnett," a/k/a "Jerome Burnett," a/k/a "Leveli Mone," a/k/a "Hassan Thomas," a/k/a "Jermaine Thomas," a/k/a "Termone Thomas," a/k/a "Terak Williams"

did knowingly and willfully obstruct, delay, and affect, and attempt to obstruct, delay, and affect, commerce and the movement of articles and commodities in commerce by robbery and commit and threaten physical violence to Victim 5, an employee of Hotel 5, in furtherance of a plan and purpose to commit robbery.

In violation of Title 18, United States Code, Section 1951(a) and Section 2.

#### <u>Count Six</u>

On or about June 19, 2014, in Essex County, in the District of New Jersey and elsewhere, defendant

TREMONE BURNETT a/k/a "Tyrone Bennett," a/k/a "Charles Burnett," a/k/a "Jerome Burnett," a/k/a "Leveli Mone," a/k/a "Hassan Thomas," a/k/a "Jermaine Thomas," a/k/a "Termone Thomas," a/k/a "Terak Williams"

did knowingly and willfully obstruct, delay, and affect, and attempt to obstruct, delay, and affect, commerce and the movement of articles and commodities in commerce by robbery and commit and threaten physical violence to Victim 6, an employee of Hotel 6, in furtherance of a plan and purpose to commit robbery.

In violation of Title 18, United States Code, Section 1951(a) and Section 2.

## **Count Seven**

On or about June 19, 2014, in Essex County, in the District of New Jersey and elsewhere, defendant

TREMONE BURNETT a/k/a "Tyrone Bennett," a/k/a "Charles Burnett," a/k/a "Jerome Burnett," a/k/a "Leveli Mone," a/k/a "Hassan Thomas," a/k/a "Jermaine Thomas," a/k/a "Termone Thomas," a/k/a "Terak Williams"

during and in relation to a crime of violence for which the defendant may be prosecuted in a court of the United States, specifically, the Hobbs Act robbery set forth in Count Six, did knowingly use, carry, and in furtherance of such crime, possess a firearm, which was brandished, and did aid and abet the same.

In violation of Title 18, United States Code, Section 924(c)(1)(A)(ii) and Section 2.

## ATTACHMENT B

I, James Scartozzi, am a Special Agent with the Federal Bureau of Investigation. I am fully familiar with the facts set forth herein based on my own investigation, my conversations with other law enforcement officers, and my review of reports, documents, and items of evidence. Where statements of others are related herein, they are related in substance and part. Since this complaint is being submitted for a limited purpose, I have not set forth each and every fact that I know concerning this investigation. Where I assert that an event took place on a particular date, I am asserting that it took place on or about the date alleged.

1. From on or about May 9, 2014, through on or about June 19, 2014, the defendant Tremone Burnett ("BURNETT") robbed at least six hotels in New Jersey. BURNETT used a firearm in each robbery.

2. On or about May 9, 2014, at approximately 1:15 a.m., BURNETT entered a hotel in Rockaway, New Jersey ("Hotel 1"). BURNETT approached a hotel employee ("Victim 1"), brandished a black handgun, and instructed Victim 1 to deposit approximately US\$200 in a bag that BURNETT provided to Victim 1. Before departing, BURNETT also stole uncashed employee paychecks that were stored behind the front desk of Hotel 1. Victim 1 later identified BURNETT to law enforcement as the individual who committed the robbery of Hotel 1.

3. On or about May 31, 2014, at approximately 1:30 a.m., BURNETT entered a hotel in Secaucus, New Jersey ("Hotel 2"). BURNETT spoke on a cellular telephone briefly, then exited Hotel 2. BURNETT returned a few minutes later, brandishing a black handgun. BURNETT vaulted over the front desk, pointed the handgun at a hotel employee ("Victim 2"), and demanded money. BURNETT stole approximately US\$200 and then directed Victim 2 into a back office, told Victim 2 to lie on the floor, and departed. Victim 2 later identified BURNETT to law enforcement as the individual who committed the robbery of Hotel 2.

4. On or about June 8, 2014, at approximately 2:05 a.m., BURNETT entered a hotel in Lebanon, New Jersey ("Hotel 3"). BURNETT approached a hotel employee ("Victim 3") and requested a guest room. Victim 3 informed BURNETT that no rooms were available. BURNETT then asked to use a restroom, so Victim 3 told BURNETT where the restroom was located. Instead of going to the restroom, however, BURNETT walked behind the front desk, pointed a black handgun at Victim 3, and demanded money. BURNETT directed Victim 3 into a back office, tied Victim 3's feet and hands, and instructed Victim 3 to sit in a corner of the office. Soon after, an unknown co-conspirator (the "CO-CONSPIRATOR"), entered the office. BURNETT and the CO-CONSPIRATOR then stole approximately US\$500 and a safe-deposit box that was located in the office, and then departed Hotel 3. Victim 3 later identified BURNETT to law enforcement as the individual who committed the robbery of Hotel 3.

5. On or about June 15, 2014, at approximately 2:34 a.m., BURNETT entered a hotel in Carteret, New Jersey ("Hotel 4") and asked a hotel employee ("Victim 4") if there were

any other employees working at the hotel at that time. Victim 4 informed BURNETT that Victim 4 was the only employee on duty. BURNETT then pointed a black handgun at Victim 4 and demanded money. BURNETT directed Victim 4 into a back office where he tied Victim 4's hands and feet. BURNETT then stole approximately US\$250 and a personal credit card, and then departed Hotel 4. During the robbery, BURNETT communicated with an unknown co-conspirator using a cellular telephone. Victim 4 later identified BURNETT to law enforcement as the individual who committed the robbery of Hotel 4.

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6. On or about June 15, 2014, at approximately 3:00 a.m., BURNETT entered a hotel in Newark, New Jersey ("Hotel 5"). BURNETT approached a hotel employee ("Victim 5") and asked to reserve a guest room. Victim 5 informed BURNETT that no rooms were available. BURNETT then asked to use a restroom, so Victim 5 told BURNETT where the restroom was located. Instead of going to the restroom, however, BURNETT jumped over the front desk, pointed a black handgun at Victim 5, and demanded money. BURNETT tied Victim 5's feet and hands and placed Victim 5 in a room. BURNETT stole approximately US\$1,300 as well as a safe-deposit box that was located in Hotel 5, and then departed. During the robbery, BURNETT communicated with an unknown co-conspirator using a cellular telephone. Victim 5 later identified BURNETT to law enforcement as the individual who committed the robbery of Hotel 5.

7. On or about June 19, 2014, at approximately 3:50 a.m., BURNETT entered another hotel in Newark, New Jersey ("Hotel 6"). BURNETT pointed a black handgun at a hotel employee ("Victim 6") and demanded money. BURNETT then directed Victim 6 into a back office, where he found and stole approximately US\$400. BURNETT also stole from Hotel 6 a safe-deposit box, an automated teller machine (or ATM), and Victim 6's personal cellular telephone. BURNETT was talking to an unknown co-conspirator during the robbery, using a cellular telephone. BURNETT instructed the co-conspirator to "Pull up and get me." BURNETT then departed Hotel 6. Victim 6 later identified BURNETT to law enforcement as the individual who committed the robbery of Hotel 6.

8. At all times relevant to this Complaint, each of the above-mentioned hotels engaged in commerce, as defined in 18 U.S.C. § 1951(b)(3).